#### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

NATHANIEL J. BROUGHTY,

Plaintiff,

Case No. 2:22-cv-6458-SDW-AME

v.

CHRISTOPHER E. BOUZY,

Defendant.

#### **CERTIFICATION OF COUNSEL**

I, William P. Reiley, being of full age, hereby certify as follows:

I am an attorney at law in the State of New Jersey and an Associate of Ballard Spahr LLP, attorneys for defendant, Christopher E. Bouzy ("Bouzy"). I make this certification based on personal knowledge and in support of Bouzy's motion to dismiss Plaintiff's Complaint.

I submit this Certification to place before the Court copies of certain tweets and YouTube videos referenced in Plaintiff's Complaint and the Memorandum of Law in Support of Defendant's Motion to Dismiss Plaintiff's Complaint ("Bouzy's MTD Memorandum"). My co-counsel and I worked with a litigation paralegal at our firm to capture true and correct copies of these tweets and videos, either from where they were originally published on the Internet or, for tweets that have been deleted, from archived versions available online. In light of recent Twitter

outages,<sup>1</sup> it seemed particularly prudent to provide the Court with copies of tweets that are challenged in or otherwise relevant to this matter.

The first 22 numbered exhibits correspond to the numbering used in Bouzy's MTD Memorandum and the Appendix thereto to refer to the 22 tweets Plaintiff challenges in his Complaint.

- 1. Attached as **Exhibit 1** is a true and accurate copy of a tweet posted by Bouzy on September 17, 2022, which was deleted and which is now available at <a href="https://pbs.twimg.com/media/Fc0KMr1aEAA2B5I?format=jpg&name=large">https://pbs.twimg.com/media/Fc0KMr1aEAA2B5I?format=jpg&name=large</a>.
- 2. Attached as **Exhibit 2** is a true and accurate copy of a tweet posted by Bouzy on September 17, 2022, which was deleted and which is now available at <a href="https://web.archive.org/web/20220918095151/https:/twitter.com/cbouzy/status/157">https://web.archive.org/web/20220918095151/https:/twitter.com/cbouzy/status/157</a> 1362743222996993.
- 3. Attached as **Exhibit 3** is a true and accurate copy of a tweet posted by Bouzy on September 17, 2022, which was deleted and which is now available at <a href="https://web.archive.org/web/20220918095151/https:/twitter.com/cbouzy/status/157">https://web.archive.org/web/20220918095151/https:/twitter.com/cbouzy/status/157</a> 1362743222996993.
- 4. Attached as **Exhibit 4** is a true and accurate copy of a tweet posted by Bouzy on September 17, 2022, which was deleted and which is now available at

<sup>&</sup>lt;sup>1</sup> See, e.g., Elizabeth Dwoskin, *Twitter experiences a widespread global outage*, The Washington Post (Dec. 28, 2022), <a href="https://www.washingtonpost.com/technology/2022/12/28/twitter-global-outage/">https://www.washingtonpost.com/technology/2022/12/28/twitter-global-outage/</a>.

https://web.archive.org/web/20220918095151/https:/twitter.com/cbouzy/status/1571362743222996993.

- 5. Attached as **Exhibit 5** is a true and accurate copy of a tweet posted by Bouzy on September 17, 2022, which was deleted and which is now available at <a href="https://web.archive.org/web/20220918095151/https:/twitter.com/cbouzy/status/157">https://web.archive.org/web/20220918095151/https:/twitter.com/cbouzy/status/157</a> 1362743222996993.
- 6. Attached as **Exhibit 6** is a true and accurate copy of a tweet posted by Bouzy on September 18, 2022, which was deleted and which is now available at <a href="https://pbs.twimg.com/media/Fc6W12QXwAABiDn?format=png&name=900x900">https://pbs.twimg.com/media/Fc6W12QXwAABiDn?format=png&name=900x900</a>.
- 7. Attached as **Exhibit 7** is a true and accurate copy of a tweet posted by Bouzy on September 18, 2022, which was deleted and which is now available at <a href="https://web.archive.org/web/20220918095151/https:/twitter.com/cbouzy/status/157">https://web.archive.org/web/20220918095151/https:/twitter.com/cbouzy/status/157</a> 1362743222996993.
- 8. Attached as **Exhibit 8** is a true and accurate copy of two related tweets posted by Bouzy on September 21, 2022, which are available at <a href="https://twitter.com/cbouzy/status/1572541182223462400">https://twitter.com/cbouzy/status/1572541184534532097</a>.
- 9. Attached as **Exhibit 9** is a true and accurate copy of a tweet posted by Bouzy on September 20, 2022, which is also available at <a href="https://twitter.com/cbouzy/status/1572212550762369026">https://twitter.com/cbouzy/status/1572212550762369026</a>.

- 10. Attached as **Exhibit 10** is a true and accurate copy of four related tweets posted by Bouzy on September 20, 2022, which are also available at <a href="https://twitter.com/cbouzy/status/1572218674970345472">https://twitter.com/cbouzy/status/1572218674970345472</a>, <a href="https://twitter.com/cbouzy/status/157220559928213508">https://twitter.com/cbouzy/status/1572214045738147842</a>, and <a href="https://twitter.com/cbouzy/status/1572215688336642052">https://twitter.com/cbouzy/status/1572215688336642052</a>.
- 11. Attached as **Exhibit 11** is a true and accurate copy of a tweet posted by Bouzy on September 20, 2022, which is also available at <a href="https://twitter.com/cbouzy/status/1572254077303812096">https://twitter.com/cbouzy/status/1572254077303812096</a>.
- 12. Attached as **Exhibit 12** is a true and accurate copy of a tweet posted by Bouzy on September 20, 2022, which is also available at <a href="https://twitter.com/cbouzy/status/1572289168998531082">https://twitter.com/cbouzy/status/1572289168998531082</a>.
- 13. Attached as **Exhibit 13** is a true and accurate copy of a tweet posted by Bouzy on September 21, 2022, which is also available at https://twitter.com/cbouzy/status/1572590052886327299.
- 14. Attached as **Exhibit 14** is a true and accurate copy of two tweets posted by Bouzy on September 22, 2022, and October 5, 2022, which are also available at <a href="https://twitter.com/cbouzy/status/1572995372628189190">https://twitter.com/cbouzy/status/1577756511748726786</a>, respectively.

- 15. Attached as **Exhibit 15** is a true and accurate copy of a tweet posted by Bouzy on October 15, 2022, which is also available at <a href="https://twitter.com/cbouzy/status/1581291484867100672">https://twitter.com/cbouzy/status/1581291484867100672</a>.
- 16. Attached as **Exhibit 16** is a true and accurate copy of a tweet posted by Bouzy on October 14, 2022, which is also available at <a href="https://twitter.com/cbouzy/status/1581047028565450752">https://twitter.com/cbouzy/status/1581047028565450752</a>.
- 17. Attached as **Exhibit 17** is a true and accurate copy of a tweet posted by Bouzy on October 17, 2022, which is also available at <a href="https://twitter.com/cbouzy/status/1582121496486772737">https://twitter.com/cbouzy/status/1582121496486772737</a>.
- 18. Attached as **Exhibit 18** is a true and accurate copy of a tweet posted by Bouzy on October 26, 2022, which is also available at <a href="https://twitter.com/cbouzy/status/1585293182245507072">https://twitter.com/cbouzy/status/1585293182245507072</a>.
- 19. Attached as **Exhibit 19** is a true and accurate copy of a tweet posted by Bouzy on September 23, 2022, which is also available at <a href="https://twitter.com/cbouzy/status/1573298258277191680">https://twitter.com/cbouzy/status/1573298258277191680</a>.
- 20. Attached as **Exhibit 20** is a true and accurate copy of a tweet posted by Bouzy on October 14, 2022, which is also available at <a href="https://twitter.com/cbouzy/status/1581011864682926080">https://twitter.com/cbouzy/status/1581011864682926080</a>.

- 21. Attached as **Exhibit 21** is a true and accurate copy of a tweet posted by Bouzy on October 23, 2022, which is also available at <a href="https://twitter.com/cbouzy/status/1584343241129791489">https://twitter.com/cbouzy/status/1584343241129791489</a>.
- 22. Attached as **Exhibit 22** is a true and accurate copy of a tweet posted by Bouzy on October 6, 2022, which is also available at <a href="https://twitter.com/cbouzy/status/1578008179249643520">https://twitter.com/cbouzy/status/1578008179249643520</a>.
- 23. Attached as **Exhibit 23** is a true and accurate copy of a video posted on YouTube by Plaintiff and Eric Hunley on September 17, 2022, which is also available at <a href="https://www.youtube.com/watch?v=9k3rds5Htc0">https://www.youtube.com/watch?v=9k3rds5Htc0</a>.
- 24. Attached as **Exhibit 24** is a true and accurate copy of a video posted on YouTube by Plaintiff on December 12, 2020, which is also available at <a href="https://www.youtube.com/watch?v=Wr3RCHpDr24">https://www.youtube.com/watch?v=Wr3RCHpDr24</a>.
- 25. Attached as **Exhibit 25** is a true and accurate copy of a video posted on YouTube by Plaintiff on September 20, 2022, which is also available at <a href="https://www.youtube.com/watch?v=\_IPC0a2YKz8">https://www.youtube.com/watch?v=\_IPC0a2YKz8</a>.
- 26. Attached as **Exhibit 26** is a true and accurate copy of a video posted on YouTube by "Shannon Q" on June 4, 2020, which is also available at <a href="https://www.youtube.com/watch?v=sMSU4W2r14E">https://www.youtube.com/watch?v=sMSU4W2r14E</a>.

- 27. Attached as **Exhibit 27** is a true and accurate copy of a video posted on YouTube by Eric Hunley on December 1, 2020, which is also available at <a href="https://www.youtube.com/watch?v=G30-SUw9dbU">https://www.youtube.com/watch?v=G30-SUw9dbU</a>.
- 28. Attached as **Exhibit 28** is a true and accurate copy of a video posted on YouTube by Plaintiff on October 7, 2022, which is also available at <a href="https://www.youtube.com/watch?v=hP1eh20phpE">https://www.youtube.com/watch?v=hP1eh20phpE</a>.
- 29. Attached as **Exhibit 29** is a true and accurate copy of a tweet posted by Plaintiff on September 15, 2022, which is also available at <a href="https://twitter.com/NatetheLawyer/status/1570529174519160832">https://twitter.com/NatetheLawyer/status/1570529174519160832</a>.
- 30. Attached as **Exhibit 30** is a true and accurate copy of a tweet posted by Bouzy on September 17, 2022, which is also available at https://twitter.com/cbouzy/status/1571200195274088448.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 9, 2023 /s/ William P. Reiley
William P. Reiley



#### Christopher Bouzy @ @cbouzy · 46m

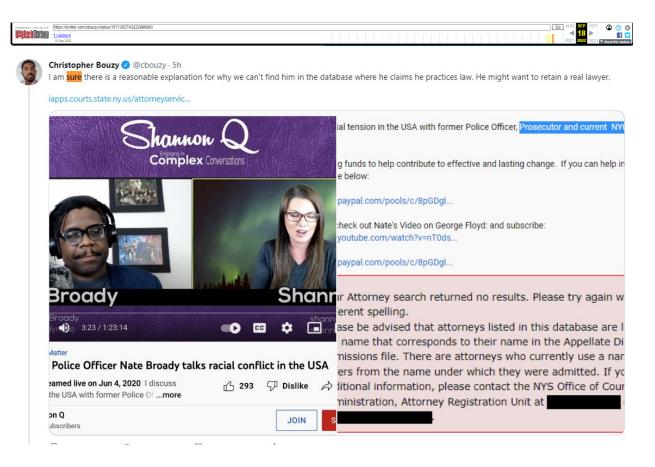
Next up is "Nate the Lawyer." He went from being the son of two crackheads (his words), a drug dealer (his words), a cop, and a prosecutor, to attacking journalists and me on social media. You would think someone with a law enforcement background would know better.



Nate Broady aka Nate the Lawyer was a Cop, Prosecutor, and Law School Lecturer - Exploring human behavior and its consequences... It's time to #Discover #EricHunleyLive this is #EricHunleyUnstructured.



Nate Broady aka Nate the Lawyer was a Cop, Prosecutor, and Law School Lecturer Nate The Lawyer is a former prosecutor, law enforcement officer, Law School Lecturer and



#### 





Christopher Bouzy ♥ @cbouzy · 7h

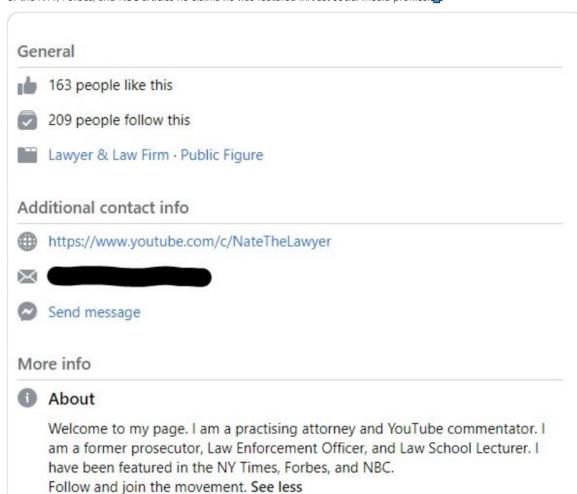
YouTube should really verify certain professionals' licenses before allowing them to claim they are doctors or lawyers. I can't tell if this guy is a legit lawyer or just a social media lawyer. Where does he advertise his services?





Christopher Bouzy 📀 @cbouzy · 7h

While NateTheLawyer attempts to impress his gullible followers with a non-issue, I still can't find his bar association number or the NYT, Forbes, and NBC articles he claims he was featured in. Just social media profiles.



#### 





#### Christopher Bouzy @cbouzy · 6h

While we wait on NateTheLawyer to locate his law license and the links to his NYT, Forbes, and NBC articles, I will share my NYT, Forbes, and NBC articles.

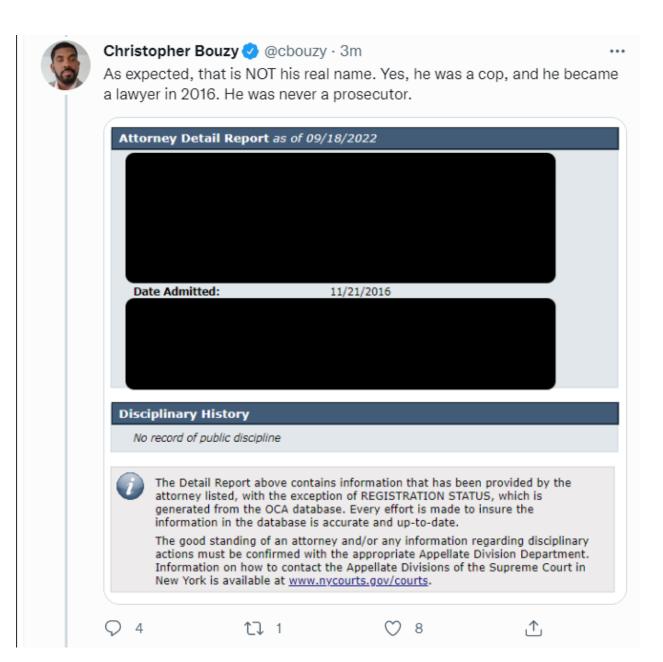
NYT: nytimes.com/2022/05/18/opi...

Forbes: forbes.com/sites/marisade...

NBC: nbcnews.com/news/world/pri...

CNBC: cnbc.com/2022/05/14/elo...









He was a CUNY campus cop for 10 years, and he was then admitted to their law school. He joined the DAs office in 2016, and 6 years later, he became a Twitter troll and YouTube grifter. Quite the resume.



4:57 AM · Sep 18, 2022 · Twitter Web App



I grew up with Black men like Nathaniel Broughty. Men like Nathaniel are not comfortable in their skin, so they go out of their way to prove they are "different" or "better." He is the type that would insult Black women so he could fit in with his Caucasian peers...

7:00 AM · Sep 21, 2022



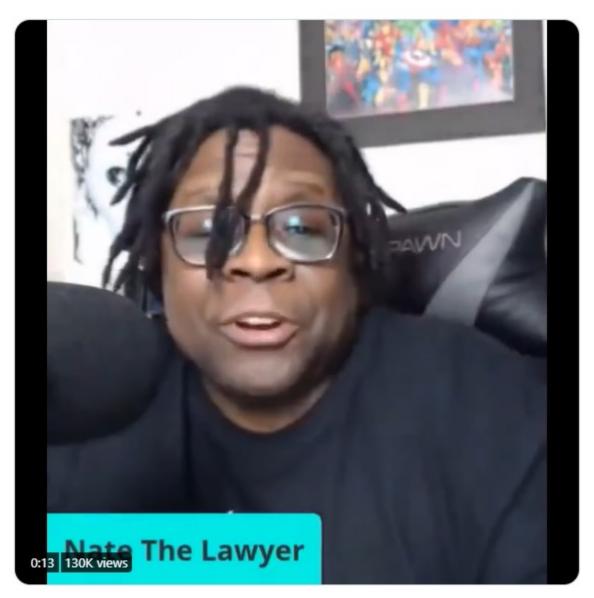


I knew after his account was unlocked, he would continue attacking me because this was the most attention he had received in his entire life. He desperately wants to be relevant, and he will go out of his way to prove "I am one of you" by attacking someone who looks like him...

7:00 AM · Sep 21, 2022



New: Unearthed video of former NYC cop and Assistant District Attorney Nathaniel Broughty admitting he planted evidence as a cop but also knew when cops brought suspects in with bogus evidence when he was an ADA. Every arrest and prosecution should be reinvestigated. Wow...





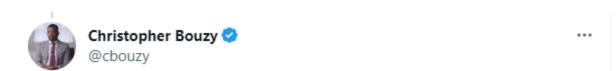
Every lawyer whose client was arrested by this criminal and prosecuted because of his "evidence" should petition the court for a new trial or have the conviction tossed out. He clearly stated he planted evidence.

9:38 AM · Sep 20, 2022



Think about how many innocent people's lives were ruined because of this guy. Someone could be sitting in prison right now for something they didn't do. And he is on YouTube bragging about committing a felony. He is bragging about it like it was nothing. Disgusting...

9:46 AM · Sep 20, 2022



The way he brags about planting evidence on video is shocking. How many men and women are sitting in prison because of bogus evidence because of Nathaniel? He became an Assistant District Attorney in 2016, which wasn't long ago.

9:20 AM · Sep 20, 2022



His law license should be suspended; these are his words. Anyone that would plant evidence on a suspect, and know other cops were planting evidence as an Assistant District Attorney, shouldn't be allowed to practice law.

9:26 AM · Sep 20, 2022



Imagine being a Black man bragging and laughing about planting evidence on suspects. "He became an ADA and reported bad cops." So what? How many lives were ruined when he planted evidence as a cop? He casually admitted to a felony on camera.



11:59 AM · Sep 20, 2022

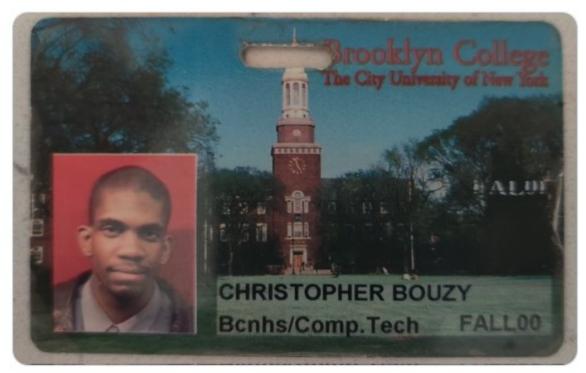


While fake accounts try to spin Nathaniel's words, what "tricks" would a cop use on a suspect? Why would a cop need "tricks" for a legitimate arrest?

2:18 PM · Sep 20, 2022



Why is Nathaniel lying to his followers? When I was in my early 20s, I was building networks and servers for high schools and universities, while he is was planting evidence on innocent suspects. I could've worked anywhere, but I wanted to use my talents to help my community...



10:14 AM · Sep 21, 2022

Θ



New: Former NYC cop and Assistant District Attorney Nathaniel Broughty is threatening to sue Bot Sentinel and me because we published a video of him admitting he falsified evidence when he was a cop. He is now trying to raise \$30,000. Here is the video again.



Θ



I love Twitter's new mixed media feature. Here is NateTheLawyer laughing about planting evidence.



4:24 PM · Oct 5, 2022





Nathaniel Broughty's lawyer claims Nathaniel had a spotless record when he was a Campus Peace Officer at CUNY.

#### Spoiler alert: lol



In found at <a href="https://www.youtube.com/wate-ELPmzJkDCLju2KnD5oyZMQ&t=809">https://www.youtube.com/wate-ELPmzJkDCLju2KnD5oyZMQ&t=809</a>. It is Broughty to be admitting to the felonies of ssions of unlawful conduct by him, that und an complaint or accusation was ever lodged mishandling evidence — in connection with string which time he was also never "written or any misconduct whatsoever."



10:30 AM · Oct 15, 2022

Θ



True story: Since NateTheLawyer, LawTube, and Caroline Orr Bueno started their coordinated smear campaign back in September, we have received more interest in our research, and there has been an increase in interview requests. So I guess I should say thank you.



6:19 PM · Oct 14, 2022

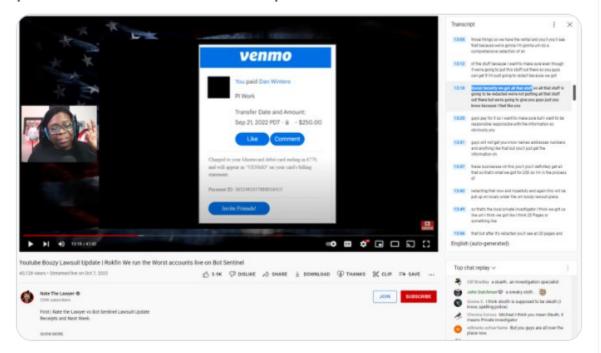


Professional liars like NateTheLawyer prey on people who lack critical thinking skills. First, he tells his followers I am broke, and then he tells followers I am being paid by a bunch of politicians and celebrities. Which one is it?

5:28 PM · Oct 17, 2022



Nathaniel Broughty bragged to his @YouTube viewers about illegally obtaining my social security number, and then he showed the Venmo receipt as proof of who he paid. You can make this up.



11:32 AM · Oct 26, 2022





#### We are going to need more popcorn.



Hello, sorry of the wait but we have been working very hard to get results.

We may have some others join our cause of action against the targeted harassment. The wheels of justice move slowly but they are moving.

I will be going live soon for a full update.

Stay Tuned.

LAWYER JUSTICE/LAWSUIT

DONATE NOW SHARE

9:08 AM · Sep 23, 2022



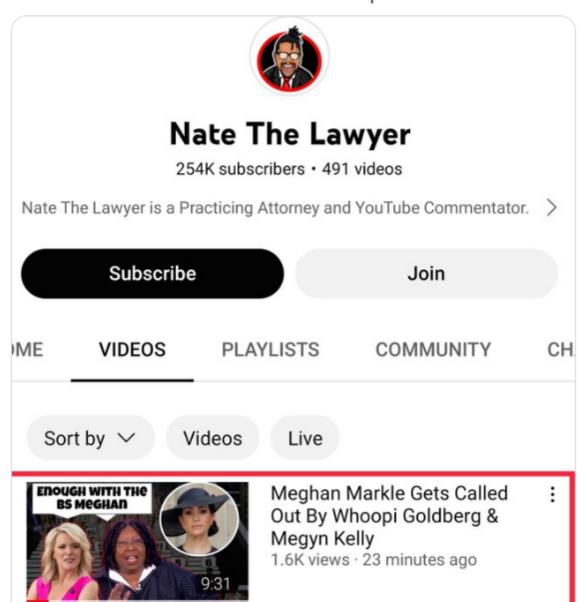


Nathaniel Broughty didn't stop at only reinvigorating his YouTube channel. He also figured out he could convince a bunch of gullible suckers to donate to his "legal fund" by promising he could stop Bot Sentinel and me. Compare his Twitter profile back in May to now...





I told you NateTheLawyer was an opportunistic grifter, and now he is making videos about Meghan Markle because his channel views have evaporated.



8:37 PM · Oct 23, 2022





Nate has to downplay it because he spent a week raising \$32,000 and telling people I will go through some things, and so far, all he has accomplished is to take money from people and make himself and Ron Coleman richer. "Trust the process."





Nivosoa-WILL NOT PAY TO STAY HERE 📷 @Nivo\_Tweeter · Oct 6, 2022

Replying to @cbouzy

Nat has no argument left other than "take my word for it", Chris has no power to cause this disaster. 🎎

9:04 AM · Oct 6, 2022





Bot Sentinel is a paid propaganda firm.
Funny how the "we believe Amber" accounts like
Cocainecross are good and the "we believe the fact"
accounts are bad.



Replying to @NiermanJoe @NatetheLawyer and @RekietaLaw

Botsentinal is totally useless. Plug in the most "controversial" Twitter handle you
can think of and check out the results.

5:45 PM · Sep 15, 2022



Two "lawyers" from the LawTube community are complaining about YouTube demonetizing Trevor Coult MC. Lawyers are defending a man who said Meghan Markle should be "shot at dawn" and suggested she should be "strangled to death." A man who mocked and insulted Meghan's babies...

